

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

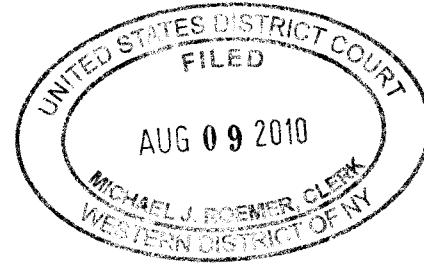
CHRISTINE CHRISTENSEN,

Plaintiff,

-against-

NATIONAL RECOVERY SOLUTIONS, LLC,

Defendant.



**VERIFIED COMPLAINT and DEMAND  
FOR JURY TRIAL**

**10 CV 654**

*[Handwritten signature]*

Now comes Plaintiff, Christine Christiansen (Plaintiff), by and through her attorneys, Krohn & Moss, Ltd., alleges the following against Defendant, National Recovery Solutions, LLC (Defendant):

Nature of the Action

1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 United States Code 1692 et seq.

Parties

2. Plaintiff is a natural person residing in Clackamas, Oregon.
3. Plaintiff is a consumer as that term is defined by 15 United States Code 1692a(3), and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by 15 United States Code 1692a(5).
4. Defendant is a debt collector as that term is defined by 15 United States Code 1692a(6), and sought to collect a consumer debt from Plaintiff.
5. Defendant is a collection agency with a business office in Lockport, New York.
6. Defendant acted through its agents, employees, officers, members, directors, heirs,

successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

Jurisdiction and Venue

7. Jurisdiction of this court arises pursuant to 15 United States Code 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."
8. Defendant conducts business and is principally located in the state of New York, and therefore, personal jurisdiction is established.
9. Venue is proper pursuant to 28 United States Code 1391(b)(1).

Factual Allegations

10. Defendant communicates with Plaintiff seeking and demanding payment for an alleged debt (File #: 220100).
11. Defendant failed to provide appropriate notice of the alleged debt (see Letter dated February 16, 2010, attached hereto as Exhibit A).

Claim for Relief

12. Defendant violated the Fair Debt Collection Practices Act based on the following:
  - a. Defendant violated §1692g(a)(3-5) of the Fair Debt Collection Practices Act by failing to provide appropriate notice of the debt including: (3) a statement that unless the consumer, within 30 days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector; (4) a statement that if the consumer notifies the debt collector in writing within the 30-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a

judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and (5) a statement that, upon the consumer's written request within the 30-day period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

Wherefore, Plaintiff, Christine Christiansen, respectfully requests judgment be entered against Defendant, National Recovery Solutions, LLC, for the following:

13. Statutory damages of \$1,000.00 pursuant to the Fair Debt Collection Practices Act, 15 United States Code 1692k,

14. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 United States Code 1692k,

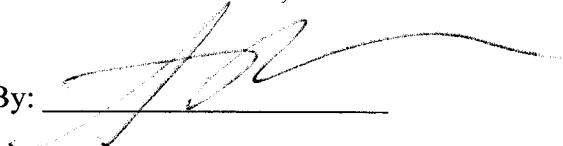
15. Any other relief that this Honorable Court deems appropriate.

**DEMAND FOR JURY TRIAL**

Plaintiff, Christine Christiansen, demands a jury trial in this cause of action.

Dated: August 5, 2010

KROHN & MOSS, LTD.

By: 

Adam T. Hill  
KROHN & MOSS, LTD.  
120 W. Madison St., 10th Floor  
Chicago, Illinois 60602  
Tel: 323-988-2400 x238  
Fax: 866-870-0941  
[ahill@consumerlawcenter.com](mailto:ahill@consumerlawcenter.com)  
Attorney for Plaintiff

**VERIFICATION**

STATE OF OREGON )

:ss.:

COUNTY OF CLACKAMAS )

Plaintiff, CHRISTINE CHRISTENSEN, being duly sworn, deposes and says:

1. I am the Plaintiff in this civil proceeding;
2. I have read the foregoing Verified Complaint prepared by my attorneys and I believe that all of the facts contained therein are true and correct, to the best of my knowledge, and formed after reasonable inquiry;
3. I believe that this civil Complaint is well ground in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law;
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it;
6. Each and every exhibit I have provided to my attorneys, which has/have been attached to this Complaint, is/are true and correct copy(s) of the original(s); and
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated the exhibit(s), except that some of the attached may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, CHRISTINE CHRISTENSEN, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Dated: 7-30-10



CHRISTINE CHRISTENSEN

**Exhibit A**

PO BOX 322

Lockport, NY 14095-0322

Hours of Operation: 8am - 9pm EST Monday - Friday  
8am - 5pm EST Saturday

Telephone: 1-888-863-5498

February 16, 2010

Dear CHRISTINE CHRISTENSEN,

This letter identifies National Recovery Solutions is in possession of the debt previously held by ~~BANK OF AMERICA N.A. (USA)~~. At this time an outstanding balance in the amount of [REDACTED] remains on the above mentioned claim. The balance in full is now due.

You have thirty days in which to dispute the validity of the debt or any portion thereof.

Please contact us at 1-888-863-5498 to make payment arrangements, or to discuss this matter further. You can also visit our website, [www.nrsecurepay.com](http://www.nrsecurepay.com), and view the options available to resolving your account.

Sincerely,

Chris Caves  
Sr. Account Specialist

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This is a communication from a debt collector.

Please note the return address (6341 Inducon Drive East, Sanborn, NY 14132) located on the front of this notice, is not the address of National Recovery Solutions, LLC. This address is for processing undeliverable mail only. Please do not send correspondence or payments to that address. Please send payments or correspondence to National Recovery Solutions, LLC, P.O. Box 322, Lockport, NY 14095

*Please detach and return bottom portion in the enclosed envelope with your payment!*

6341 Inducon Drive East  
Sanborn, NY 14132-9097

IF PAYING BY CREDIT CARD, PLEASE COMPLETE THIS SECTION		
<input type="checkbox"/>	CARD NUMBER	AMOUNT
<input type="checkbox"/>	SIGNATURE	EXP. DATE
CARDHOLDER NAME (Please Print)		CCD

CREDIT CARD ID # ON BACK OF CARD		
REASON		
BANK OF AMERICA N.A. (USA)		
ACCOUNT NUMBER	FILE NUMBER	AMOUNT DUE
[REDACTED]	220100	[REDACTED]
		AMOUNT \$ ENCLOSED

R  
[REDACTED]  
A-01-Y3Z-AN-01800-9  
CHRISTINE CHRISTENSEN  
[REDACTED]



NATIONAL RECOVERY SOLUTIONS, LLC  
PO BOX 322  
LOCKPORT NY 14095-0322  
[REDACTED]